



5-3124

Department of Energy

ROCKY FLATS FIELD OFFICE  
P.O. BOX 928  
GOLDEN, COLORADO 80402-0928

APR 10 1995

95-DOE-08298

Mr. Martin Hestmark  
U. S. Environmental Protection Agency, Region VIII  
ATTN: Rocky Flats Project Manager, 8HWM-RI  
999 18th Street, Suite 500, 8WM-C  
Denver, Colorado 80202-2405

Mr. Joe Schieffelin, Unit Leader  
Hazardous Waste Facilities  
Colorado Department of Public Health and the Environment  
4300 Cherry Creek Drive South  
Denver, Colorado 80222-1530

Gentlemen:

The Department of Energy, Rocky Flats Field Office appreciates your timely review and response to our proposal to cancel the Operable Unit (OU) No. 7 Seep Collection and Treatment Proposed Action Memorandum (PAM). The purpose of this letter is to present the Department of Energy's (DOE) proposal to modify the current scope of the PAM.

As stated in the process improvement proposal for OU 7, the closure actions for Individual Hazardous Substance Site 114, the Present Landfill evaluated in the Phase I Interim Measure/Interim Remedial Action (IM/IRA) Environmental Assessment (EA) Decision Document, would be limited to the Environmental Protection Agency (EPA) guidance for Presumptive Remedy alternatives. The closure action must also comply with the Colorado Code of Regulations (CCR) Closure Requirements for a Solid Waste Site Facility.

Under the Presumptive Remedy, measures to control landfill leachate should be implemented based on site-specific data. Modeling indicates that 60% of the seep is caused by groundwater flowing under the existing groundwater intercept system. DOE proposes to enhance and/or repair the slurry wall on the north side of the landfill where the existing groundwater intercept system is failing. This action is compatible with the IM/IRA alternatives under consideration. The enhancement and/or repair of the existing slurry wall may be accomplished by use of another slurry wall (slurry walls are the most common subsurface barriers for unconsolidated earth materials), or use of another barrier material such as the Waterloo Barrier, based upon engineering evaluation. The modified PAM will contain the technical details of this proposal.

To implement the existing Seep Collection and Treatment PAM as written would be premature at this time. The results of the focused/screening level risk assessment under the Presumptive Remedy will determine what constituents will require treatment in order to meet state and/or other appropriate water quality standards. DOE RFFO will screen the contaminants of concern in the leachate by using background values and preliminary remediation goals. A focused risk assessment, following the Presumptive Remedy guidance, will then be performed. Remaining contaminants that pose an unacceptable

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risk will then be treated to meet state and/or other appropriate water quality standards. These results will be presented in the IM/IRA/EA Decision Document.

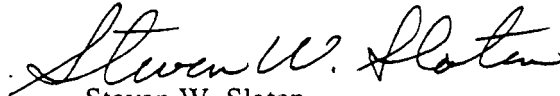
This modification would require the following adjustments to the schedule in Table 5-1 of the PAM:

Draft Document to CDPHE and EPA	June 8, 1995
Public Comment Period (30 days concurrently)	
Final Document and Responsiveness Summary	
to CDPHE and EPA	August 7, 1995
Begin Construction	October 18, 1995

Your comments on this strategy are important in achieving our shared vision and priorities for the site. In order to prevent adverse impact to the IM/IRA/EA schedule, DOE requests that you provide your comments no later than close of business on April 21, 1995.

We look forward to your continued cooperative efforts. If you have any specific questions relative to this proposal, please contact Peg Witherill at 966-6585.

Sincerely,

  
Steven W. Slaten  
IAG Project Coordinator  
Environmental Restoration

M. Hestmark & J. Schieffelin  
95-DOE-08298

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cc:

J. Alquist, EM-452, HQ  
H. Belancan, EM-453, HQ  
L. Ekman, EM-453, HQ  
M. Silverman, OOM, RFFO  
K. Klein, OOM, RFFO  
D. Lindsay, OCC, RFFO  
A. Duran, EPA  
C. Spreng, CDPHE  
J. Roberson, AMER, RFFO  
F. Lockhart, DAMER, RFFO  
J. Wienand, ER, RFFO  
S. Tower, ER, RFFO  
B. Thatcher, ER, RFFO  
P. Witherill, ER, RFFO  
B. Williamson, ER, RFFO  
B. April, EGD, RFFO  
J. Rampe, PME, RFFO  
J. Kerridge, WMD, RFFO  
S. Stiger, EG&G  
E. Mast, EG&G  
L. Peterson-Wright, EG&G  
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